

CPA Experience Composite Wood ATCM 3rd Party Certification

**ARB TPC Workshop
May 8, 2008**

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Application Process

- Questions Mainly Objective
- CPA Answers: Supplemented References from
 - CPA Grademark Manual,
 - ISO Guide 65 Scoping and Compliance Letters
 - ISO Guide 17025 Scoping and Compliance Letters
- Filed Application on 4/15/08
- Awaiting Approval
- Provided Current, Draft Carbonized Manual
 - Minor Procedural Changes
 - Need CARB Staff feedback;
 - Will ballot CPA Board after Approval.



CPA TPC Services

- **Environmentally Preferable Product**
 - Recovered/Recycled Wood, HCHO
 - Since 2002
- **Formaldehyde Grademark**
 - Since 1984
 - ISO 65 – ANSI; ISO 17025 - NVLAP
- **Physical & Mechanical Grademark**
 - Since 1968
 - Building Code PB Products: PBU, MHD, ST
 - Hardboard Since 2002
 - ISO 17020 - IAS



CPA TPC Services (Cont.)

- **Draft of TPC Audit Program for ULEF/NAF Producers**
- **Pilot Program Soon**



ATCM Status, NA PB-MDF Mills

- CPA will certify 55 North American Facilities in 2008
- 49 of 55 are in EPP Certification
- EPP Program Adopted Phase 1 limits as of 4/1/08
- All Member Companies Can expect CARB Phase 1 Certification within 2 months of TPC Approval
- Expect all facilities to be certified by the end of 3rd Quarter, probably before.



Testing

- **Opened New Lab in May**
- **Switching Certification Testing from Gaithersburg to Leesburg by 5/31**
- **One Inquiry for JIS Desiccator Test Method for Use as a Quality Test**



CARB Application (Cont.)

- C. Describe the process and the qualifications required for the approval of a manufacturer's Quality Control (QC) manual.
- ... of QC personnel and the sufficiency of on-site small-scale testing facilities.
- ...of procedures used to select samples for small-scale testing.



CARB Application (Cont.)

- C.4 Describe the procedures used to establish a facility's correlation value between their small-scale test method and either the primary or secondary test method, and the data required to be kept on site.



CARB Application (Cont.)

- D.1 Describe the process and the qualifications required for the approval of sample selection, handling, and shipping procedures used by the plant's QC personnel.
- ...the type and amount of primary or secondary method testing-related information QC personnel will be asked to keep on-site for your inspection.



CARB Application (Cont.)

- **D.3 Describe what will be required in a manufacturer's plan of action if they fail a quarterly primary or secondary method test.**



CARB Application (Cont.)

- E.1 Describe the specifics of a facility inspection.
 - procedures, reviews and actions
 - Inspection frequency
 - Records to be inspected
 - Sampling



CARB Application (Cont.)

- E.2 Describe the criteria used to verify compliance with the QC requirements of the ATCM.



CARB Application (Cont.)

- Attach a copy of the Guidance Manual used for the certification, license agreements required of certified facilities, applications required of facilities wishing to participate in the program and examples of Quality Manuals required for certified facilities.



CPA Certification Programs

- Production Committee Oversight
- Physical and Mechanical (1968)
- Formaldehyde
- Environmental Preferable
Product Specification CPA 3-08



Formaldehyde Program

- HUD Rule: 1984
- Industry Standards Expanded to Include Formaldehyde Emissions 1986
- Daily In Plant Testing to Monitor Production
- 3rd Party Audits



CPA Certification Program

- Program Accreditation
- Laboratory Accreditation
- Both Include On Site Audits



Program Requirements

- Plant Quality Control Manual
- Quality Control Personnel
- Testing Facilities
- Equipment Calibration



Quality Control Limit

- QCL Established for Each Product
- Correlation to Large Chamber Test
- Reviewed to Ensure Confidence
- R Value
- Shipping QCL



Plant Quality Control Test

- Certification of Product Based on Test Results
- 1 Test per 8 Hours of Production
- 1 Test Represents 1 Lot
- Monitor Test Results with Graph



Target Operating Limit

- Calculated Using Standard Deviation
- Emission Target For Plant
- Calculated a Minimum of Twice a Year
- $TOL = (x \text{ factor} * SD) - QCL$
- 30 Panel Average



Excursion Limit

- “not to exceed” Limit
- Calculation: $EL = (1.35 * SD) + QCL$
- Statistical Theory 99.9%
- Calculated a Minimum of Twice a Year



Non Complying Lots

- Three Ways to Measure, trip non-compliance rules
 - Immediate, Short and Long Term
- Disposition of Non Complying Lots
- CPA Notification Letter
- Experimental Notification



Non Complying Lots

- Non Complying Lots Based on Plant Tests
- Three Ways a Lot is Non Complying Based on Last 100 Tests
 1. Any Test over the EL
 2. 3rd Test Out of 5 Over the QCL
 3. 6th Test Out of 100 Over the QCL



Loss of Certification

- Three Ways Privilege is Lost
 1. Large Chamber Test Failure
 2. Plant Test: 6 Consecutive Tests Over the QCL
 3. Plant Test: 11 Tests Over the QCL of the Last 100



Loss of Stamp

- Certification Stops Immediately
- CPA Reinspection and Requalification Procedures



Reduce Loss of Stamp Impact

- Monitor Plant Test Result
- Back Up Large Chamber Samples Collected
- Separate Product Categories
- Contact CPA Representative



Plant Program Maintenance

- Monitor Plant Test Results
- Weekly Reports to CPA Representative
- Plant QC Manual Review
- Notification Letters to CPA
- Database



Environmentally Preferable Product

- Voluntary Product Specification
- Recycled and/or Recovered Fiber with Adherence to Formaldehyde Standards
- EPPS CPA 3-08 – Matches CARB ATCM Phase 1



Plant EPP Responsibilities

- Plant EPP QC Manual
- Track Incoming Raw Material and Production
- Supplier Verification Letters
- CPA Quarterly Audits





COMPOSITE PANEL ASSOCIATION